

**Simpson Thacher & Bartlett LLP**

425 LEXINGTON AVENUE  
NEW YORK, NY 10017-3954

TELEPHONE: +1-212-455-2000  
FACSIMILE: +1-212-455-2502

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 8/13/2021

**MEMO ENDORSED**

Direct Dial Number  
+1-212-455-3070

E-mail Address  
Brooke.Cucinella@stblaw.com

BY ECF

August 12, 2021

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Daniels*, 19 Cr. 931-WHP-3 (S.D.N.Y.)

Dear Judge Caproni:

We represent Defendant Quinteria Daniels in the above-captioned case. We write to request, with the consent of the Government, a modification of Ms. Daniels's voluntary surrender date, as described below. On April 7, 2021, Ms. Daniels was sentenced to 6 months' incarceration, which will begin August 25, 2021. On June 2, 2021, Ms. Daniels was notified that she was scheduled to surrender to Philadelphia FDC on August 25, 2021 by 10:00 a.m.

We respectfully request that Ms. Daniels's surrender date be modified to August 30, 2021 at 12:00 p.m. so that she can finalize child care services and be present when her oldest daughter starts a new school this year, before Ms. Daniels begins serving her term.

We have conferred with Assistant U.S. Attorney Rebecca Dell, who has advised that she consents to this request.

Thank you for your consideration.

Respectfully submitted,

/s/ Brooke Cucinella  
Brooke Cucinella

cc: AUSA Rebecca Dell

Application GRANTED.

Ms. Daniels must surrender by August 30, 2021 at 12:00 P.M.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

Date: August 13, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE